

Attached hereto as **APPENDIX A** is a marked-up version of the changes made to the claims by the current amendment. The attached pages are captioned “**VERSION WITH MARKINGS TO SHOW CHANGES MADE.**”

Claim Rejection – 35 U.S.C. § 102(b)

The Examiner has rejected claims 1-8 under 35 U.S.C. § 102 as being anticipated by Tharp (US 4,842,732) (“the Tharp reference”). Reconsideration and withdrawal of this rejection are respectfully requested based on the following remarks.

As defined in amended claim 1, the claimed invention relates to a replaceable filtration module. The module is usable in a traveling bridge filter system to remove solids from water being treated. The filtration module includes first and second walls coupled together by a connection element, along with a porous filter plate extending between them. Further, claim 1 requires “a porous filter plate carried by said at least one connection element and extending between the opposed edges of said first wall and said second wall, said porous filter plate supporting a granular filter media during filtration.” Thus, among other things, the instant claimed invention requires a porous filter plate which supports a granular media during filtration.

The Tharp reference is directed to an apparatus for aerating and mixing waste water. The device contains a porous “diffuser” plate, but not a porous “filter” plate as in the instant application. The porous diffuser plate in the Tharp reference diffuses air into wastewater, whereas the porous filter plate in the instant application removes solids from wastewater, which the porous diffuser plate in the Tharp reference is incapable of performing. The Tharp reference thus does not disclose or suggest a “porous filter plate supporting a granular filter media during filtration,” as recited in claim 1 of the instant application in combination with the other elements recited therein. In view of the complete absence of this claim limitation in the Tharp reference,

the Tharp reference does not disclose each and every element of claim 1, either expressly or inherently, and thus does not anticipate the claimed invention. Accordingly, the rejection under 35 U.S.C. § 102(b) should be withdrawn and claim 1 should be allowed.

Claims 2-7 depend from claim 1, and therefore are also free of anticipation by the Tharp reference.

Claim Rejection – 35 U.S.C. § 102(b)

The Examiner has rejected claims 1, 4, and 7 under 35 U.S.C. § 102 as being anticipated by Ferri (US 4,882,053) (“the Ferri reference”). Reconsideration and withdrawal of this rejection are respectfully requested based on the following remarks.

As defined in amended claim 1, the claimed invention relates to a replaceable filtration module. The module is usable in a traveling bridge filter system to remove solids from water being treated. The entire module assembly, including a first wall and a second wall, at least one connection element coupling the walls, and a porous filter plate extending between them, can be installed or removed as a unit, and not merely the filtering element (i.e., “porous filter plate”) per se. Further, claim 1 requires “a replaceable filtration module inserted between adjacent cell dividers.” Thus, among other things, the instant claimed invention requires a filtration module which is replaceable as a unit.

The Ferri reference is directed to a porous filter support plate. The plate in the Ferri reference is also usable in a traveling bridge filter system to removed solids from water being treated. The Ferri reference, however, does not disclose or suggest that an entire filtration module, including the walls, a connection element therebetween, and a porous filter plate, could or should be replaceable and insertable between adjacent cell dividers as a unit, as recited in claim 1 of the instant application in combination with the other elements recited therein. In view

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of the complete absence of this claim limitation in the Tharp reference, the Tharp reference does not disclose each and every element of either claim 1, either expressly or inherently, and thus does not anticipate the claimed invention. Accordingly, the rejection under 35 U.S.C. § 102(b) should be withdrawn and claim 1 should be allowed.

Claims 2-7 depend from claim 1, and therefore are also free of anticipation by the Ferri reference.

CONCLUSION

In view of the foregoing, the application is now believed to be in condition for formal allowance. Prompt and favorable action is respectfully requested.

Respectfully submitted,



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APPENDIX A

VERSION WITH MARKINGS TO SHOW CHANGES MADEIn the Claims:

Claim 1 has been amended as follows:

1. (Twice Amended) A replaceable filtration module inserted between adjacent cell dividers, comprising:

a first wall and a second wall having opposed edges;

means for supporting the first and second walls on adjacent cell dividers;

at least one connection element coupling said first wall to said second wall; and

[and] a porous filter plate carried by said at least one connection element and extending between the [located adjacent to] opposed edges of said first wall and said second wall, said porous filter plate supporting a granular filter media during filtration.

Claim 8 has been canceled without prejudice.